

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

This Document Relates to All Actions

**TPP TRIAL DEFENDANTS' MOTION TO EXCLUDE THE OPINIONS OF
DR. RENA CONTI**

PLEASE TAKE NOTICE that on March 18, 2024, Defendants Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai U.S., Inc.; Prinston Pharmaceutical Inc.; Solco Healthcare U.S., LLC; Teva Pharmaceuticals USA, Inc.; Teva Pharmaceutical Industries Ltd.; Actavis LLC; Actavis Pharma, Inc.; Torrent Pharmaceuticals Ltd.; and Torrent Pharma, Inc. (collectively, the “TPP Trial Defendants”), by and through their undersigned counsel, shall move for the entry of an Order excluding the testimony of plaintiffs’ proposed expert Dr. Rena Conti. This motion is made to the Hon. Robert B. Kugler, United States District Judge, pursuant to Rule 702 of the Federal Rules of Evidence and the applicable local rules of this Court.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the TPP Trial Defendants shall rely on the accompanying Memorandum of Law in Support of TPP Trial Defendants’ Motion to Exclude the Opinions of Dr. Rena Conti, and the exhibits thereto.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith;

PLEASE TAKE FURTHER NOTICE that oral argument is requested, if this motion is opposed; and

PLEASE TAKE FURTHER NOTICE that a Certificate of Service attesting to the date and manner of service is submitted herewith.

Dated: February 12, 2024

Respectfully submitted,

By: /s/ Jessica Davidson

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Attorneys for Defendants Torrent Pharmaceuticals Ltd. and Torrent Pharma, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 12, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ *Jessica Davidson*
Jessica Davidson